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IDAHO PUBLIC
UTILITIES COMMISSION

201 South Main, Suite 2300
Salt Lake City, Utah 84111

October 23, 2014

***VIA ELECTRONIC FILING
AND OVERNIGHT DELIVERY***

Jean D. Jewell
Commission Secretary
Idaho Public Utilities Commission
472 W. Washington
Boise, ID 83702

**Re: CASE NO. PAC-E-14-08
IN THE MATTER OF THE APPLICATION OF ROCKY MOUNTAIN POWER
FOR AUTHORITY TO CANCEL ELECTRIC SERVICE SCHEDULES 115, 125,
AND 155 AND REPLACE WITH NEW SCHEDULE 140 WITH CHANGES**

Dear Ms. Jewell:

Please find for electronic filing Rocky Mountain Power's reply comments in the above referenced matter. The Company has also shipped for overnight delivery an original and seven (7) copies of its reply comments.

Informal inquiries may be directed to Ted Weston, Idaho Regulatory Manager at (801) 220-2963.

Sincerely,

Kathryn Hymas
Vice President, Finance and Demand Side Management

Enclosures
CC: Benjamin Otto/ICL

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Attorney for Rocky Mountain Power

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE)	
APPLICATION OF PACIFICORP DBA)	CASE NO. PAC-E-14-08
ROCKY MOUNTAIN POWER TO)	
CANCEL ELECTRIC SERVICE)	
SCHEDULES 115, 125, AND 155 AND)	REPLY COMMENTS OF
REPLACE WITH NEW SCHEDULE 140)	ROCKY MOUNTAIN POWER
WITH CHANGES)	
)	

COMES NOW PacifiCorp, dba Rocky Mountain Power (“RMP” or the “Company”), and hereby responds to Idaho Conservation League’s Comments in the above referenced case.

BACKGROUND

On August 22, 2014, the Company filed an Application, pursuant to Idaho Code §§ 61-301, 61-307, 61-622, and 61-623, with the Commission seeking to consolidate Electric Service Schedules: No. 115 - FinAnswer Express; No. 125 - Energy FinAnswer; and No. 155 – Agricultural Energy Services, with modification, under a new Electric Service Schedule No. 140, Non-Residential Energy Efficiency.

On October 16, after review and analysis of the Application, the Idaho Public Utilities Commission staff (“Staff”) and Idaho Conservation League (“ICL”) submitted comments. Staff’s comments recommended the Commission approve the Application,

and ICL's comments recommended the Commission approve the Application, subject to minor changes.

ICL COMMENTS

ICL opposes the Company's proposal to discontinue the New Construction Design Assistance, Design Honorarium and Design Team Incentives, and recommends the Company continue to offer these programs in the combined wattsmart Business portfolio.¹ In addition, ICL proposed the following modifications to the Company's Application: (2) to allow for stakeholders to review and comment on proposed changes at the same time as Commission Staff through informal comment;² (3) update programs to reflect changing codes and that updating the baseline should depend on the lighting installed in the Company's Idaho service territory, rather than a change in the standard; (4) the Company should document that their Idaho business customers have actually converted from T12 to more efficient lights;³ and (5) Lastly, ICL submits the Company should include additional measures beyond lighting, specifically measures to address office equipment as well as heating and cooling needs.⁴

RMP REPLY COMMENTS – ICL

The Company proposed removing the incentive for New Construction Design Assistance, the Design Honorarium and Design Team Incentives due to the comprehensiveness of the new offering and the low participation in these offerings. The proposed streamlined program simplifies customer participation and provides the elements of the existing programs that have been moving the market. The new program

¹ ICL Comments at 2.

² ICL Comments at 3.

³ ICL Comments at 6.

⁴ *Id.*

focuses the customers' program participation and the Company's resources on the program features that are most effective at delivering energy savings projects.

While comments from interested stakeholders as described by ICL are valued, the Company does not feel that mandating an informal comment period for interested stakeholders is required. Notwithstanding, the Company will ensure ICL or other interested stakeholders are given the opportunity to informally review proposed changes at the same time as Staff and provide comments.

The Company agrees with ICL that updating the baseline should align with the lighting installed in the Company's Idaho service territory. This research was completed and the Company recommends the Commission not mandate another lighting baseline study. Given that the general service fluorescent lighting federal standard (effective July 14, 2012 for lamps) applies to lighting manufacturers and imports of lighting, and does not necessitate customers change their lighting until it fails, the baseline change for Idaho was made approximately 18 months later on January 1, 2014 after conducting research in 2013 to inform the timing for the change. The research built upon work undertaken by the Bonneville Power Administration and included sales and survey data from commercial lighting contractors, distributors and manufacturers as well as recent program participants in PacifiCorp service territories (ID, UT, WY, WA and CA). The research concluded that January 1, 2014 was an appropriate time to make the baseline change. Based on this research, the Company does not believe additional research work to document that Idaho business customers have actually converted from T12 to more efficient lights has added value.

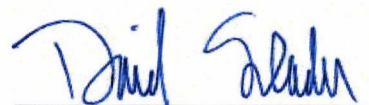
With respect to additional measures, the Company recommends approval of the small business lighting as submitted in the Application. However, the Company will continue to review other possible qualifying measures for the small business offering that are found to be cost effective, and will bring those measures forward for Staff and stakeholder input prior to implementation.

CONCLUSION

Based on the Application and these reply comments, the Company recommends the following:

- Approve the discontinuance of the New Construction Design Assistance, Design Honorarium and Design Team Incentives
- Not mandate an informal comment period for interested stakeholders to comment on proposed changes
- Not require additional research on Idaho business customers' conversion from T12 to more efficient lights
- Approve the small business lighting as submitted in the Application.

Respectfully submitted this 23rd day of October, 2014.



Daniel E. Solander
Attorney for Rocky Mountain Power